

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
IN THE WESTERN DIVISION
CIVIL ACTION NO. 7:25-CV-01185-FL

JASON HEWETT, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiff,

v.

INNOVATIVE TAX RELIEF LLC,

Defendant.

**DEFENDANT'S MOTION FOR
EXTENSION OF TIME TO FILE
ANSWER OR OTHER RESPONSIVE
PLEADINGS**

NOW COMES Defendant Innovative Tax Relief LLC (“Innovative”), pursuant to Fed. R. Civ. P. 6 and Local Rule 6.1, by and through undersigned counsel, and respectfully moves the Court for an extension of time to answer or otherwise respond to the Complaint [DE 1] of Plaintiff Jason Hewett (“Hewett”). In support hereof, Innovative shows the Court the following:

1. Hewett filed his Complaint on 6 June 2025 [DE 1].
2. Hewett, through counsel, filed an Affidavit of Service [DE 6] on 27 June 2025,

indicating that Innovative received service of process on 26 June 2025.

3. Pursuant to Rule 12 of the Federal Rules of Civil Procedure, Defendant Innovative has 21 days after receiving service of the Summons and Complaint to respond to the Summons and Complaint.

4. Defendant Innovative’s response to Hewett’s Summons and Complaint is currently due on 17 July 2025.

5. This Court has authority to extend the time for a party to respond to a complaint when a party moves this Court for additional time before the original time expires. *See Fed. R. Civ. P. 6(b)(1)(A).*

6. Innovative seeks this extension to allow Innovative sufficient time to evaluate and investigate the allegations of the Complaint and to prepare a responsive pleading to the Complaint.

7. Pursuant to Local Rule 6.1(a), Defendant Innovative, through counsel, consulted with Hewett's counsel regarding the requested extension, and Hewett's counsel consents.

8. This is Innovative's first request for additional time to respond to the Complaint in this action.

9. This request is not made for the purpose of unreasonable delay and will not prejudice any party to this action.

WHEREFORE, Defendant Innovative respectfully prays for an extension of twenty-one (21) additional days, up to and including 7 August 2025, in which to answer or otherwise respond to Hewett's Complaint, and for such further relief as the court finds just and proper.

Respectfully submitted, this the 17th day of July 2025.

MCANGUS GOODELOCK & COURIE, PLLC

/s/Luke A. Dalton
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CERTIFICATE OF SERVICE

I hereby certify that on 17 July 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will serve notification of such filing on registered users, including the following:

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This the 17th day of July, 2025.

/s/Luke A. Dalton
LUKE ANDREW DALTON